

NELSON MULLINS RILEY &  
SCARBOROUGH, L.L.P.  
Counsel for Dätwyler, Inc.  
Meridian Building, Seventeenth Floor  
1320 Main Street  
Post Office Box 11070 (29211)  
Columbia, SC 29201  
(803) 799-2000  
GEORGE B. CAUTHEN (GBC-5268)


UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re: ) CASE NO. 05-44481 (RDD)  
)  
Delphi Corporation, *et al.*, ) CHAPTER 11  
) (Jointly Administered)  
Debtors. )  
)

**NOTICE OF RECLAMATION DEMAND OF DÄTWYLER, INC.**

PLEASE TAKE NOTICE that a written reclamation demand was mailed on October 24, 2005 by Dätwyler, Inc. A copy of Dätwyler, Inc.'s reclamation demand, along with the attachments thereto and proof of mailing, are attached hereto as Exhibit A and are incorporated herein by reference.

NELSON MULLINS RILEY & SCARBOROUGH, L.L.P.

By:  /s/ George B. Cauthen

George B. Cauthen (*pro hac vice pending*)  
Jody A. Bedenbaugh (*pro hac vice pending*)  
Meridian Building, Seventeenth Floor  
1320 Main Street  
Post Office Box 11070 (29211)  
Columbia, SC 29201  
(803) 799-2000

Attorneys for Dätwyler, Inc.

October 27, 2005  
Columbia, South Carolina

## **EXHIBIT A**

# Nelson Mullins

**Nelson Mullins Riley & Scarborough LLP**  
Attorneys and Counselors at Law  
1320 Main Street / 17<sup>th</sup> Floor / Columbia, South Carolina 29201  
Tel: 803.799.2000 Fax: 803.256.7500  
www.nelsonmullins.com

George B. Cauthen  
Certified Bankruptcy Specialist  
By the South Carolina Supreme Court  
(Admitted in SC & FL)  
803.255.9425  
george.cauthen@nelsonmullins.com

October 24, 2005

**Via Federal Express and Certified Mail – Return Receipt Requested**

John Wm. Butler, Jr., Esquire  
Skadden Arps Slate Meagher & Flom (IL)  
333 West Wacker Drive  
Chicago, IL 60606-1285

Delphi Corporation  
5725 Delphi Drive  
Troy, MI 48098

Re: Delphi Corporation  
Case No. 05-44481-rdd; Dätwyler, Inc. – Reclamation Claim  
Our File No. 19922/01500

Dear Jack and Sir or Madam:

This Firm has been engaged to represent Dätwyler, Inc. in connection with the above-referenced bankruptcy. Pursuant to S.C. Code Ann. § 36-2-702, and Section 546(c) of the United States Bankruptcy Code, demand is hereby made upon you to return all goods received during the period referred to in these statutes. Specifically, this demand includes without limitation the goods corresponding to the invoices identified in the enclosed schedule.

Please contact me at your earliest convenience for instructions regarding the return of the goods. In light of the bankruptcy filing, please note that all goods subject to Dätwyler, Inc.'s right of reclamation must be protected and segregated by the Debtor and shall not be used for any purpose whatsoever except those specifically authorized following notice and a hearing by the Bankruptcy Court.

This reclamation right is separate and independent of that of Dätwyler Rubber & Plastics, Inc., a subsidiary of Dätwyler, Inc., which was sent to you on October 14, 2005.

John Wm. Butler, Jr., Esquire  
October 24, 2005  
Page 2

I look forward to speaking with you soon.

Very truly yours,

A handwritten signature in black ink, appearing to be "G. B. Cauthen", written over a horizontal line.

George B. Cauthen

GBC:ggv  
Enclosure

cc: Amy Jenkins, Esquire  
Mr. Willy Ruefenacht

Invoice

Dätwyler Inc.  
Rubber + Plastics  
Militärstrasse 7  
CH-6467 Schattdorf  
Tel. +41 41 875 11 23

**Dätwyler**

Document no. 91014387  
Customer no. 30355

Date 09/28/2005 Page 1 1

DELPHI AUTOMOTIVE SYSTEMS  
GLOBAL PURCHASE  
P.O. BOX 20366  
5500 WEST HENRIETTE RD  
ROCHESTER, NY 14608-0366  
USA

Our reference Nicole Zurfluh  
Telephone +41 41 875 1664  
Fax +41 41 875 1760  
E-Mail nicole.zurfluh@dag.ch  
Your reference Mr. Ted Rivera  
Your order new production  
Date of order 09/12/2005  
Our no. client 1019071  
Delivery note 80035138 / 09/28/2005  
Order confirmation 21225 / 09/12/2005

Mode of dispatch  
Courier  
Terms of delivery (Incoterms 2000)  
EXW Ex works  
Schattdorf  
Terms of payment  
Up to 12/02/2005 without deduction  
Net weight  
30.000 KG

Address of delivery:  
DELPHI E & C GRAND RAPIDS  
PLANT F801 / DLOC 0001  
TOBY ALBRIGHT  
2100 BURLINGAME SW  
GRAND RAPIDS, MI 49509  
USA

Item	Material	Description	Quantity	Price	per	Amount USD
0001	325170	SEAL - WIPER MOLO F 8677- CRWG 25332632 MATERIAL FPM 486661	76,800 PC	17.40	100	13,363.20
Total items						13,363.20
Total amount in USD						13,363.20

Credit Suisse, CH-6460 Altendorf  
SWIFT: CRESCH2264K USD-Kto 256000-02-5  
IBAN: CH47 0462 0026 6000 0200 5

The exporter of the products covered by this document (customs authorization No 7740-2005) declares, that, except where otherwise clearly indicated, these products are of Swiss preferential origin.

Asif Isdergand

MOVSTIN: CH 195 684  
Fax-Nr: +41 41 875 1726

Invoice

Dätwyler Inc.  
Rubber + Plastics  
Militarstrasse 7  
CH-6467 Schattdorf  
Tel. +41 41 875 11 23

**Dätwyler**

Document no. 91014631  
Customer no. 30355

Date 10/04/2005 Page 1 / 1

DELPHI AUTOMOTIVE SYSTEMS  
GLOBAL PURCHASE  
P.O. BOX 20366  
5500 WEST HENRIETTE RD  
ROCHESTER, NY 14608-0366  
USA

Our reference Nicole Zurfluh  
Telephone +41 41 875 1664  
Fax +41 41 875 1760  
E-Mail nicole.zurfluh@dag.ch  
Your reference Mr. Ted Rivera  
Your order new production  
Date of order 09/12/2005  
Our no. client 1019071  
Delivery note 80035448 / 10/04/2005  
Order confirmation 21225 / 09/12/2005

Mode of dispatch  
Courier  
Terms of delivery (Incoterms 2000)  
EXW Ex works  
Schattdorf  
Terms of payment  
Up to 01/02/2006 without deduction  
Net weight  
31.000 KG

Address of delivery:  
DELPHI E & C GRAND RAPIDS  
PLANT F801 / DLOC 0001  
TOBY ALBRIGHT  
2100 BURLINGAME SW  
GRAND RAPIDS, MI 49509  
USA

Item	Material	Description	Quantity	Price	per	Amount USD
0001	325170	SEAL - WIPER MOLD F 8677- DRWG 25332692 MATERIAL FPM 485061	76.800 PC	17.40	100	13.363.20
Total items						13.363.20
Total amount in USD						13.363.20

Credit Suisse, CH-6460 Aitdorf  
SWIFT CRESCHZ264K USD-Kto 266000-02-5  
IBAN: CH47 0402 0026 6000 0200 5

The exporter of the products covered by this document (customs authorization No 7740/2005) declares, that, except where otherwise clearly indicated, these products are of swiss preferential origin.

Rolf Indergand

Invoice

Dätwyler Inc.  
Rubber + Plastics  
Militarstrasse 7  
CH-6467 Schattdorf  
Tel. +41 41 875 11 23

**Dätwyler**

Document no. 91014774  
Customer no. 30355

Date 10/07/2005 Page 1 / 1

DELPHI AUTOMOTIVE SYSTEMS  
GLOBAL PURCHASE  
P.O. BOX 20366  
5500 WEST HENRIETTE RD  
ROCHESTER, NY 14608-0366  
USA

Our reference Nicole Zurfluh  
Telephone +41 41 875 1664  
Fax +41 41 875 1760  
E-Mail nicole.zurfluh@dag.ch  
Your reference Mr. Ted Rivera  
Your order new production  
Date of order 09/12/2005  
Our no. client 1019071  
Delivery note 80035700 / 10/07/2005  
Order confirmation 21225 / 09/12/2005

Mode of dispatch

**Courier**

Terms of delivery (Incoterms 2000)

**EXW Ex works**

**Schattdorf**

Terms of payment

**Up to 01/02/2006 without deduction**

Net weight

**31.000 KG**

Address of delivery:

**DELPHI E & C GRAND RAPIDS  
PLANT F801 / DLOC 0001  
TOBY ALBRIGHT  
2100 BURLINGAME SW  
GRAND RAPIDS, MI 49509  
USA**

Item	Material	Description	Quantity	Price	per	Amount USD
0001	325170	SEAL - WIPER MOLD F 8677.* DRWG 25032692 MATERIAL FPM 489661	76.800 PC	17.40	100	13.363.20
Total items						13.363.20
<b>Total amount in USD</b>						<b>13.363.20</b>

Credit Suisse, CH-6460 Altdorf  
SWIFT CRESCH2264K USD-Kto. 266000-02-6  
IBAN: CH47 0402 0026 6000 0200 5

The exporter of the products covered by this document (customs authorization No. 7740.2005) declares, that, except where otherwise expressly indicated, these products are of Swiss preferential origin.

Recht vorbehalten

AWST-Nr. CH 135 654  
Fax-Nr. +41 41 875 1726

**Nicole Stalvey**

---

**From:** TrackingUpdates@fedex.com  
**Sent:** Tuesday, October 25, 2005 3:11 PM  
**To:** Nicole Stalvey  
**Subject:** FedEx Shipment 792561810373 Delivered

---

***This tracking update has been requested by:***

***Name: 'not provided by requestor'***

***E-mail: 'not provided by requestor'***

---

***Our records indicate that the following shipment has been delivered:***

**Tracking number:** 792561810373  
**Reference:** 19922/01500  
**Ship (P/U) date:** Oct 24, 2005  
**Delivery date:** Oct 25, 2005 09:46 AM  
**Sign for by:** J.CANAN  
**Delivered to:** Shipping/Receiving  
**Service type:** FedEx Priority Overnight  
**Packaging type:** FedEx Envelope  
**Number of pieces:** 1  
**Weight:** 0.5 LB

<b>Shipper Information</b>	<b>Recipient Information</b>
Nicole Stalvey	John Wm. Butler, Jr., Esquire
Nelson Mullins	Skadden Arps Slate Meagher & Flom
1320 Main St 17th Floor	333 West Wacker Drive
MERIDIAN BLDG	Chicago
Columbia	IL
SC	US
US	606061285
29201	

***Special handling/Services:***  
***Deliver Weekday***

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**Nicole Stalvey**

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**From:** TrackingUpdates@fedex.com  
**Sent:** Tuesday, October 25, 2005 11:04 AM  
**To:** Nicole Stalvey  
**Subject:** FedEx Shipment 790197536578 Delivered

---

***This tracking update has been requested by:***

***Name: 'not provided by requestor'***

***E-mail: 'not provided by requestor'***

---

***Our records indicate that the following shipment has been delivered:***

**Tracking number:** 790197536578  
**Reference:** 19922/01500  
**Ship (P/U) date:** Oct 24, 2005  
**Delivery date:** Oct 25, 2005 09:58 AM  
**Sign for by:** R.PETERS  
**Delivered to:** Shipping/Receiving  
**Service type:** FedEx Priority Overnight  
**Packaging type:** FedEx Envelope  
**Number of pieces:** 1  
**Weight:** 0.5 LB

<b>Shipper Information</b>	<b>Recipient Information</b>
Nicole Stalvey	Delphi Corporation
Nelson Mullins	5725 Delphi Drive
1320 Main St 17th Floor	Troy
MERIDIAN BLDG	MI
Columbia	US
SC	48098
US	
29201	

***Special handling/Services:***  
***Deliver Weekday***

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THE  
WALZ  
CERTIFIED  
MAILER™

FORM #35063 VERSION: 3/05.2  
U.S. PAT. NOS. 5,501,393; 4,368,903

FROM

**WALZ™**

Delphi Corporation  
5725 Delphi Drive  
Troy, MI 48098

Label #1

Delphi Corporation  
5725 Delphi Drive  
Troy, MI 48098

Label #2

Sender  
Address 1 label  
(see below)

Label #3

FOLD AND TEAR THIS WAY → OPTIONAL

Label #5

Delphi Corporation  
5725 Delphi Drive  
Troy, MI 48098

Certified Article Number

2160 3901 9849 1943 9469

SENDERS RECORD

Charge  
Amount:

Charge

← TEAR ALONG THIS LINE

Label #6

Form #050099  
To Receiver go to

or call 1-800-800-2014

or contact your MWZ™ sales representative

THE  
WALZ  
FROM  
WALZ™  
CERTIFIED  
MAILER™  
PUM #39903 VERSION: 3/00-2  
U.S. PAT. NOS. 5,501,393; 4,368,903

Label #1  
John Wm. Butler, Jr., Esquire  
Skadden Arps Slate Meagher & Flom (IL)  
333 West Wacker Drive  
Chicago, IL 60606-1285

Label #2  
John Wm. Butler, Jr., Esquire  
Skadden Arps Slate Meagher & Flom (IL)  
333 West Wacker Drive  
Chicago, IL 60606-1285

Label #3  
Sender  
Address label  
(see back of)

FOLD AND TEAR THIS WAY → OPTIONAL

Label #5

John Wm. Butler, Jr., Esquire  
Skadden Arps Slate Meagher & Flom (IL)  
333 West Wacker Drive  
Chicago, IL 60606-1285

Certified Article Number

7160 3901 9849 1943 9452

SENDER'S RECORD

Charge  
Amount:  
Charge

← TEAR ALONG THIS LINE

Label #6

From #2=998  
To #2=998

05-44481-rdd Doc 743 Filed 10/27/05 Entered 10/27/05 14:51:18

05-44481-rdd Doc 743 Filed 10/27/05 Entered 10/27/05 14:51:18

UNITED STATES BANKRUPTCY COURT

DISTRICT OF SOUTH CAROLINA

IN RE:	)	
	)	CASE NO. 05-44481-rdd
Delphi Corporation,	)	
	)	Chapter 11
	)	
Debtor.	)	
_____	)	

**CERTIFICATE OF SERVICE**

I, the undersigned Paralegal, of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for **Dätwyler Rubber & Plastics, Inc.** do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings: **Notice of Reclamation Demand of Dätwyler, Inc.**

Counsel Served: John Wm. Butler, Jr., Esquire  
Skadden Arps Slate Meagher & Flom (IL)  
333 West Wacker Drive  
Chicago, IL 60606-1285

Kayalyn A. Marafioti, Esquire  
Thomas J. Matz, Esquire  
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Four Times Square  
New York, NY 10036

Robert N. Michaelson, Esquire  
Kirkpatrick & Lockhart, LLP  
599 Lexington Ave.  
New York, NY 10022

/s/ Anne R. Price

Anne R. Price, Paralegal to  
George B. Cauthen, ID No. 81  
P.O. Box 11070  
Columbia, SC 29211  
(803) 799-2000

October 27, 2005